

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
2 Sean Pak (Bar No. 219032)  
3 seanpak@quinnemanuel.com  
4 Melissa Baily (Bar No. 237649)  
5 melissabaily@quinnemanuel.com  
6 James Judah (Bar No. 257112)  
7 jamesjudah@quinnemanuel.com  
8 Lindsay Cooper (Bar No. 287125)  
9 lindsaycooper@quinnemanuel.com  
10 Iman Lordgooei (Bar No. 251320)  
11 imanlordgooei@quinnemanuel.com  
12 50 California Street, 22nd Floor  
13 San Francisco, California 94111-4788  
14 Telephone: (415) 875-6600  
15 Facsimile: (415) 875-6700

16 Marc Kaplan (*pro hac vice*)  
17 marckaplan@quinnemanuel.com  
18 191 N. Wacker Drive, Ste 2700  
19 Chicago, Illinois 60606  
20 Telephone: (312) 705-7400  
21 Facsimile: (312) 705-7401

22 *Attorneys for Google LLC*

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

29 SONOS, INC.,  
30 Plaintiff,  
31  
32 vs.  
33 GOOGLE LLC,  
34 Defendant.

35 Case No. 3:20-cv-06754-WHA  
36 Consolidated with Case No. 3:21-cv-07559-  
37 WHA

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**DECLARATION OF LANA ROBINS IN  
SUPPORT OF GOOGLE LLC'S  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF ITS OPPOSITION TO  
SONOS, INC.'S MOTION FOR  
INJUNCTIVE RELIEF AND  
ADDITIONAL DAMAGES**

1 I, Lana Robins declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing  
 4 Google LLC (“Google”) in this matter. I make this declaration in support of Google’s Administrative  
 5 Motion to File Under Seal Portions of its Opposition to Sonos, Inc.’s (“Sonos”) Motion for Injunctive  
 6 Relief and Additional Damages (“Opposition”). I have personal knowledge of the matters set forth in  
 7 this Declaration, and if called as a witness I would testify competently to those matters.

8 2. Google seeks an order sealing the materials as listed below:

9 Document	10 Portions to Be Filed Under Seal	11 Designating Party
12 Declaration of Jocelyn Ma in Support of Google’s Opposition (“Ma Declaration”)	13 Portions outlined in red boxes	14 Google
15 Exhibit 2 to the Ma Declaration (“Exhibit 2”)	16 Portions outlined in red boxes	17 Google & Sonos

18 3. The portions of the Ma Declaration outlined in red boxes contain confidential business  
 19 information regarding Google’s highly sensitive financial and sales data, including the number of  
 20 units of each accused Google product sold in each fiscal quarter. Public disclosure of this information  
 21 would harm Google’s competitive standing and create a risk of injury by providing competitors with  
 22 access to information that Google does not have similar access to about their competitors, allowing  
 23 them to gain a competitive advantage in the marketplace. If such information were made public, I  
 24 understand that Google’s competitive standing would be significantly harmed. Google has therefore  
 25 designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY under the  
 26 protective order (Dkt. 92). I also understand that this Court has previously granted sealing of the same  
 27 and/or similar information. *See, e.g.*, Dkt. 334 at 4.

28 4. The portions of Exhibit 2 outlined in red boxes contain confidential business  
 29 information regarding Google’s products, including non-public information from internal surveys and  
 30 conjoint studies detailing consumer feedback and market research regarding Google’s smart speakers.  
 31 Public disclosure of this information would harm the Google’s competitive standing and create a risk  
 32 of injury by providing competitors with access to information regarding business strategies that

1 Google does not have similar access to about their competitors, allowing them to gain a competitive  
2 advantage in the marketplace. If such information were made public, I understand that Google's  
3 competitive standing would be significantly harmed. Google has therefore designated this information  
4 as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY under the protective order (Dkt. 92).

5 I declare under penalty of perjury under the laws of the United States of America that to the  
6 best of my knowledge the foregoing is true and correct. Executed on June 29, 2023, in Mill Valley,  
7 California.

8 DATED: June 29, 2023

9 By: */s/ Lana Robins*  
10 Lana Robins

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1 **ATTESTATION**

2 I, Sean Pak, am the ECF user whose ID and password are being used to file the above  
3 Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Lana Robins has concurred in the  
4 aforementioned filing.

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6 DATED: June 29, 2023

7 */s/ Sean Pak* \_\_\_\_\_

8 Sean Pak

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